

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CIS COMMUNICATIONS, LLC,
a Missouri limited liability company,
individually and on behalf of all
those similarly situated,

Plaintiff,

v.

REPUBLIC SERVICES, INC.,
a Delaware corporation,

and

ALLIED SERVICES, LLC,
a Delaware limited liability company,

Defendants.

Case No. 4:19-cv-00389-JAR

MOTION TO DISMISS

Pursuant to Fed. R. Civ. P. 12(b)(6), defendants Republic Services, Inc. (“Republic”) and Allied Services, LLC (“Allied,” and together with Republic, “Defendants”) hereby move to dismiss plaintiff CIS Communications, LLC’s (“CIS’s”) Complaint (3/1/19) (“Complaint”) for failure to state a claim upon which relief can be granted. Republic and Allied direct the Court to their Memorandum in Support of Motion to Dismiss, filed alongside this motion and incorporated herein.

WHEREFORE, defendants Republic and Allied respectfully request that the Court enter an Order dismissing CIS’s Complaint with prejudice.

Dated: April 17, 2019

Respectfully submitted,

By: /s/ Steven J. Alagna

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2019, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system to all counsel of record.

/s/ Steven J. Alagna